

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

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SALVADOR SANCHEZ, CELSO TORRES,
IDELFONSO GIL RODRIGUEZ,
WANDY RAMIREZ, DAVID TORRES
and JHON VINAS *on behalf of themselves*
and all others similarly situated,

20-cv-05623 (SN)

Plaintiffs,

-against-

ART+1, Inc. and ARTAN MAKsutI,
Individually,

Defendants.

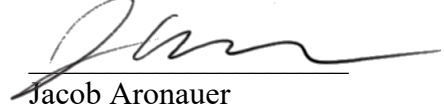
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Plaintiffs, individually and on behalf of all other similarly situated, by and through their undersigned attorneys and with the consent of Defendants Art +1, Inc. and Artan Maksuti, hereby file this Consent Motion to Approve Settlement Agreement, Cerify Settlement Class, Authorize Notice to Class, and Schedule Fairness Hearing (“Motion for Preliminary Approval of Class Action Settlement”). Plaintiffs respectfully request that the Court review and approve the terms of the proposed settlement of this action both as a collective action under the Fair Labor Standards Act, 29 U.S.C. § 216(b), and also as a class action under Fed. R. Civ. P. 23 for Plaintiffs’ claims under the New York Labor Law. Plaintiffs also request the Court to approve the proposed apportionment of the settlement proceeds, after conducting a a hearing about the fairness, reasonableness, and adequacy of the proposed settlement. Plaintiffs hereby submit a proposed notice of the settlement to be mailed or delivered to each potential class member, informing them of the terms of the Settlement Agreement, advising them of their rights under the proposed settlement, and giving them an opportunity to be heard about the final approval of the settlement.

The grounds for this motion are that the parties have reached an arms-length settlement of this matter after extensive, bona fide settlement negotiations; that the named Plaintiffs, are representatives of the class, believe that the proposed settlement is in the best interest of the class as a whole; and that all parties desire to conclude this matter without further expense, delay and uncertainty of continued litigation. This motion is supposed by the accompanying Memorandum of Law and the documents attached thereto.

Dated: March 11, 2022
New York, New York

Respectfully

A handwritten signature in dark ink, appearing to read 'J. Aronauer', is written over a horizontal line.

Jacob Aronauer
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